

June 28, 2004

Elizabeth Hunt  
Toxicology/Regulatory Services

Dear Ms. Hunt:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for 4-nonanone, 2,6,8-trimethyl- posted on the ChemRTK HPV Challenge Program Web site on February 26, 2004. I commend the Dow Chemical Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints
2. Health Effects. EPA agrees with the test plan for these endpoints. However, the submitter should have waited until the close of the public comment period before initiating any needed testing per HPV Challenge Program guidance. Also, the submitter needs to add the data described in a section 8(e) notice submitted to the EPA on June 11, 2002 (8EHQ-0602-15161) to the test plan and robust summaries. Since repeated-dose and reproductive toxicity data are lacking, the OECD TG 422 test is still appropriate.
3. Ecological Effects. EPA agrees with the test plan for these endpoints.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Dow Chemical Company advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber